

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1:25-mj-100

JUAN MANUEL ROCHA-ROMO,

Defendant.

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, **Eugene Sveum**, being duly sworn, depose and state:

1. I am a Special Agent with United States Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”), in Fairfax County, Virginia. I have been employed with ICE HSI since October 2009. I was previously employed as an Immigration Enforcement Agent with ICE, Enforcement and Removal Operations (“ERO”), beginning in April 2007. I have received specialized training and have conducted numerous investigations relating to administrative and criminal violations of the Immigration and Nationality Act and Title 8 of the United States Code.

2. My duties as a Special Agent with ICE include investigating administrative and criminal violations of the Immigration and Nationality Act and Title 8 of the United States Code, and seeking, when applicable, prosecution and removal of violators. I have received training in general law enforcement, including training in Title 8 of the United States Code.

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for Juan Manuel ROCHA-ROMO (hereafter referred to as ROCHA-ROMO), an alien who was found in the United States after being denied admission, excluded, deported, or removed, or having departed the United States while an order of exclusion, deportation, or removal was outstanding, in violation of Title 8, United States Code, Section 1326(a).

4. The facts and information contained in this affidavit are based upon my training and experience, as well as information and observations of other agents involved in this investigation that were relayed to your affiant. This affidavit contains information necessary to support probable cause, but it is not intended to include every fact and matter observed by me or known to the United States.

SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE

5. On or about September 11, 2023, ICE learned that ROCHA-ROMO had been detained at the Fairfax County Adult Detention Center located in Fairfax, Virginia, within the Eastern District of Virginia.

6. ROCHA-ROMO was fingerprinted when arrested in Fairfax and his fingerprints came back to a unique FBI number associated with ROCHA-ROMO. Those fingerprints were then processed through ICE indices containing fingerprint records of known and previously deported aliens. This system is also integrated with the criminal records maintained by the FBI and is commonly referred to as Next Generation Identification (NGI). Results of this query showed positive matches to ROCHA-ROMO and his unique FBI number. Specifically, the immigration record checks confirmed that ROCHA-ROMO is a native and citizen of Mexico with an associated alien file.

7. ROCHA-ROMA was also detained again in Fairfax, Virginia on March 25, 2024, and September 22, 2024. On both occasions, ROCHA-ROMO was fingerprinted when arrested in Fairfax and his fingerprints came back to a unique FBI number associated with ROCHA-ROMO. Those fingerprints were then processed through ICE indices containing fingerprint records of known and previously deported aliens. This system is also integrated with the NGI. Results of this query showed positive matches to ROCHA-ROMO and his unique FBI number. Specifically, the immigration record checks confirmed that ROCHA-ROMO is a native and citizen of Mexico with an associated alien file.

8. ICE performed records checks which confirmed that ROCHA-ROMO is a native and citizen of Mexico who was removed from the United States on or about January 28, 2013, at or near Laredo, Texas; and on or about August 1, 2013, at or near Laredo, Texas. ROCHA-ROMO did not have legal authorization to reenter or remain in the United States.

9. I also reviewed documents from ROCHA-ROMO's associated alien file maintained by U.S. Citizenship and Immigration Services (USCIS). The documents I reviewed from the file revealed that ROCHA-ROMO is a citizen and national of Mexico. The alien file was associated with ROCHA-ROMO though, amongst other things, his unique FBI number. The documents I reviewed contained one previously executed Immigration Service Form I-296 "Notice to Alien Ordered Removed/Departure Verification," and one previously executed Immigration Service Form I-205 "Warrant of Removal/Deportation," bearing ROCHA-ROMO's photograph, fingerprint, and signature. The form showed that ROCHA-ROMO was removed from the United States on the following date and place of removal:

- a) January 28, 2013, from Laredo, Texas;

b) August 1, 2013 from Laredo, Texas;

10. Records checks were conducted of both ICE and USCIS indices which revealed a lack of evidence of any immigration benefit, document, or status that would allow ROCHA-ROMO to legally enter, be admitted, pass through, or reside in the United States. Furthermore, ROCHA-ROMO has not obtained permission from the Attorney General or the Secretary of the Department of Homeland Security to reenter the United States following his formal removal.

CONCLUSION

11. Based on the foregoing, I submit that there is probable cause to believe that on or about September 11, 2023, in Fairfax County, Virginia, within the Eastern District of Virginia, ROCHA-ROMO, an alien who was removed from the United States on or about January 28, 2013, at or near Laredo, Texas; and on or about August 1, 2013, at or near Laredo, Texas, was found in the United States without having obtained the express consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States.

Respectfully submitted,



Eugene Syeum
Special Agent
Immigration and Customs Enforcement

Respectfully submitted and attested to in
accordance with the requirements of Fed. R.
Crim. P. 4.1 by telephone on February 28,
2025.



The Honorable William E. Fitzpatrick
United States Magistrate Judge
Alexandria, Virginia